

## OLSHAN

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November 30, 2007

VIA FACSIMILE

Hon. Paul A. Crotty  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 735  
New York, NY 10007

**USDS SDNY  
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*A* Application **GRANTED**  
**SO Ordered** DEC 03 2007

*Paul Kint*  
OSD/S

Re: AJW Partners, LLC v. EMTA Holdings, Inc., 07 Civ. 8719 (PAC)

Dear Judge Crotty:

We are counsel to plaintiffs in this action. I am writing, per instruction from your staff, to request an adjournment of the briefing schedule for plaintiffs' proposed motion to remand this action to state court. I make this request because the parties are negotiating a resolution of this matter and do not wish to engage in motion practice while they negotiate.

Under the current schedule, plaintiffs' moving papers are due today. I request that the Court extend plaintiffs' time to serve and file their moving papers to December 21, 2007, with opposition papers due January 14, 2008, and reply papers due January 21, 2008.

Defendant's counsel Eric W. Berry does not object to this request, provided that he does not have to serve opposition papers before January 14, 2008.

Thank you for considering this request.

Respectfully,

Jack M. Kint, Jr.

cc: Eric W. Berry, Esq. (counsel to defendant EMTA Holdings, Inc.)

**MEMO ENDORSED**

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